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**PRISCILLA D. KAM**

PARTNER

(516) 357-3341

[priscilla.kam@rivkin.com](mailto:priscilla.kam@rivkin.com)

926 RXR Plaza

Uniondale, NY 11556-0926

T 516.357.3000 F 516.357.3333

November 7, 2022

**VIA ECF**

Judge Brian M. Cogan  
United State District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Government Employees Ins. Co. et al. v. Boulevard 9229 LLC et al.  
Docket No.: 1:22-cv-02160 (BMC) / RR File No.: 5100.3242**

Dear Judge Cogan:

We represent Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company, and GEICO Casualty Co. (collectively, "Plaintiffs") in the above- referenced matter. We write on behalf of Plaintiffs and Defendants Boulevard 9229 LLC, Ishbay Shukurov, Albertson Pharmacy Inc., and Arkadiy Abramov (collectively, "Remaining Defendants") to respectfully advise the Court that the parties have reached a settlement in principle which will resolve all claims Plaintiffs have asserted against Remaining Defendants in this action. Plaintiffs and Remaining Defendants expect to file a stipulation of dismissal by November 11, 2022. Plaintiffs previously reached settlements in this this matter and filed stipulations of dismissal with respect to all other Defendants.

Moreover, the parties are currently scheduled to appear before Your Honor for an Order to Show Cause video hearing on Wednesday, November 9, 2022 regarding pending discovery disputes. The parties respectfully submit that the settlement in principle absolves the need to proceed with the hearing, however, the parties are of course prepared to proceed should the Court so require.

We thank the Court for its attention to this matter.

Respectfully submitted,  
RIVKIN RADLER LLP

A handwritten signature in black ink, appearing to read "Priscilla D. Kam", written over a light gray rectangular background.

Priscilla D. Kam

cc: Counsel for Defendants (via ECF)